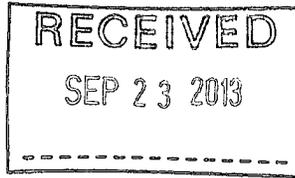

NAVAJO GENERATING STATION

P.O. Box 850
Page, AZ 86040
(928) 645-6217
Fax (928) 645-7298



ROBERT K. TALBOT
Manager

May 22, 2013

Ms. Charlene Nelson, Program Supervisor
Operating Permit Program
RT 112 North Building #2427
Fort Defiance, Arizona 86504

**Re: Title V Renewal Application - Addendum
Navajo Generating Station
Permit No. NN-ROP 05-06**

Dear Ms. Nelson:

Enclosed is an addendum to the application for renewal to the Salt River Project (SRP) Navajo Generating Station's (NGS) Title V air quality permit we originally submitted on January 3, 2013.

This addendum has been prepared to address the applicability of the recently promulgated and published Boiler MACT (40 CFR 63 Subpart DDDDD), which affects the auxiliary boilers at the Navajo Generating Station. This submittal only includes the forms that have been revised as a result of the applicability of the MACT:

- Operating Air Permit Application Form Section 6 – Air Pollution Units and Control Equipment Data: The last column now reflects that the Auxiliary boilers are in fact subject to a standard and that an applicability analysis is included in the application.
- Operating Air Permit Application Form Section 7 – Air Pollution Emission Rates: The allowable emission rates (in tons/year) for AUXA and AUXB have been revised since we will be accepting a 10% Capacity Factor limit in order to qualify as “Limited-Use Boilers”, in accordance with the Boiler MACT.
- Operating Air Permit Application Applicability Analysis (Attachment 2) : The form has now includes an applicability of Subpart DDDDD for AUXA and AUXB.
- Form PTE: This form has been revised to reflect PTE emissions for the auxiliary boilers with a 10% capacity factor limit.
- PTE spreadsheet showing the revised PTE calculations for AUXA and AUXB.

May 22, 2013
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- Form EUD-1: This form has been revised to indicate that the actual usage of the boilers is limited to a 10% capacity factor.
- Form I-COMP: Additional sections are being submitted for the I-COMP form showing the compliance status with the requirements of Subpart DDDDD.

If you have any questions regarding this application submittal, please contact Barbara Cenalmor at (602) 236-2322 or me at (602) 236-5256.

Sincerely,



Robert Talbot, Manager
Navajo Generating Station

cc w/attachment: Gerardo Rios, EPA Region IX
Paul Ostapuk, NGS
LOC 6-2-7.5

NAVAJO GENERATING STATION POTENTIAL TO EMIT CALCULATIONS - AUX A (Addendum 04/18/13)

Characteristics of Auxiliary Boiler Fuel and Equipment - Aux. Boiler A (from NGS Equip. Data Book., Vol. 1)

Description	Variable	Value	Units	Methodology/Source
Maximum fuel feed rate to aux. boiler	ABFFR	15,650	lb/hour	Maximum hourly capacity for each Unit
Density of No. 2 Diesel (D2)	D2OD	6.97	lb/gal	
Sulfur content of D2	S	0.50	%	Fuel Guarantee
Heating value of aux. boiler fuel	ABHHV	19,680	Btu/lb	Standard HHV used to calculate max heat input
Volumetric max. fuel feed rate	VMFFR	2.24	kgal/hour	$VMFFR (kgal/hr) = ABFFR (lb/hr) / D2OD (lb/gal) \times (1 \text{ kgal} / 1000 \text{ gal})$
Hourly max heat input to aux. boiler	HABHI	308.0	MMBtu/hr	$HABHI (MMBtu/hr) = ABFFR (lb/hr) \times ABHHV (Btu/lb) \times (1 \text{ MMBtu} / 10^6 \text{ Btu})$
Annual max heat input to aux. boiler	AABHI	269,801	MMBtu/year	$AABHI (MMBtu/yr) = HABHI (MMBtu/hr) \times HPY (hr/yr)$
Total hours/year in operation	HPY	876	hours/year	

Emission Factors for Auxiliary Boiler A (AP42 Section 1.3 [05/10], SCC 10200501)

Description	Variable	Value	Units	Methodology/Source
SO2 Emission Factor for Aux. Boiler	EFSO2	71	lb/kgal	AP-42 Section 1.3, Table 1.3-1
NOx Emission Factor for Aux. Boiler	EFNOx	24	lb/kgal	AP-42 Section 1.3, Table 1.3-1
Particulate Factor for Aux. Boiler	EFPT	2	lb/kgal	AP-42 Section 1.3, Table 1.3-1
PM-10 Emission Factor for Aux. Blr.	EFPTF	1	lb/kgal	AP-42 Section 1.3, Table 1.3-1
CO Emission Factor for Aux. Boiler	EFCO	5	lb/kgal	AP-42 Section 1.3, Table 1.3-1
VOC (NMTOC) Em. Factor for Aux. Boiler	EFVOC	0.2	lb/kgal	AP-42 Section 1.3, Table 1.3-3

Potential to Emit (PTE) Calculations for Auxiliary Boiler A

Description	Variable	Value	Units	Methodology/Source
Hourly Aux. Boiler SO2 Potential to Emit	HABSO2	159.4	lb/hour	$HABSO2 (lb/hr) = EFSO2 (lb/kgal) \times VMFFR (kgal/hr)$
Annual Aux. Boiler SO2 Potential to Emit	AABSO2	69.8	tons/year	$AABSO2 (tons/yr) = HABSO2 (lb/hr) \times HPY (hr/yr) \times (1 \text{ ton} / 2000 \text{ lbs})$
Hourly Aux. Boiler Nox Potential to Emit	HABNOx	53.9	lb/hour	$HABNOx (lb/hr) = EFNOx (lb/kgal) \times VMFFR (kgal/hr)$
Annual Aux. Boiler Nox Potential to Emit	AABNOx	23.6	tons/year	$AABNOx (tons/yr) = HABNOx (lb/hr) \times HPY (hr/yr) \times (1 \text{ ton} / 2000 \text{ lbs})$
Hourly Aux. Blr. Particulate Potential to Emit	HABPE	4.5	lb/hour	$HABPE (lb/hr) = EFPT (lb/kgal) \times VMFFR (kgal/hr)$
Annual Aux. Blr. Particulate Potential to Emit	AABPE	2.0	tons/year	$AABPE (tons/yr) = HABPE (lb/hr) \times HPY (hr/yr) \times (1 \text{ ton} / 2000 \text{ lbs})$
Hourly Aux. Blr. PM-10 Potential to Emit	HABPTE	2.2	lb/hour	$HABPTE (lb/hr) = EFPTF (lb/kgal) \times VMFFR (kgal/hr)$
Annual Aux. Blr. PM-10 Potential to Emit	AABPTE	1.0	tons/year	$AABPTE (tons/yr) = HABPTE (lb/hr) \times HPY (hr/yr) \times (1 \text{ ton} / 2000 \text{ lbs})$
Hourly Aux. Boiler CO Potential to Emit	HABCO	11.2	lb/hour	$HABCO (lb/hr) = EFCO (lb/kgal) \times VMFFR (kgal/hr)$
Annual Aux. Boiler CO Potential to Emit	AABCO	4.9	tons/year	$AABCO (tons/yr) = HABCO (lb/hr) \times HPY (hr/yr) \times (1 \text{ ton} / 2000 \text{ lbs})$
Hourly Aux. Boiler VOC Potential to Emit	HABVOC	0.4	lb/hour	$HABVOC (lb/hr) = EFVOC (lb/kgal) \times VMFFR (kgal/hr)$
Annual Aux. Boiler VOC Potential to Emit	AABVOC	0.2	tons/year	$AABVOC (tons/yr) = HABVOC (lb/hr) \times HPY (hr/yr) \times (1 \text{ ton} / 2000 \text{ lbs})$

NAVAJO GENERATING STATION POTENTIAL TO EMIT CALCULATIONS - AUX B (Addendum 04/18/13)

Characteristics of Auxiliary Boiler Fuel and Equipment - Aux. Boiler B (from NGS Equip. Data Book., Vol. 1)

Description	Variable	Value	Units	Methodology/Source
Maximum fuel feed rate to aux. boiler	ABFFR	15,650	lb/hour	Maximum hourly capacity for each Unit
Density of No. 2 Diesel (D2)	D2OD	6.97	lb/gal	
Sulfur content of D2	S	0.50	%	Fuel Guarantee
Heating value of aux. boiler fuel	ABHHV	19,680	Btu/lb	Standard HHV used to calculate max heat input
Volumetric max. fuel feed rate	VMFFR	2.24	kgal/hour	VMFFR (kgal/hr) = ABFFR (lb/hr) / D2OD (lb/gal) x (1 kgal / 1000 gal)
Hourly max heat input to aux. boiler	HABHI	308.0	MMBtu/hr	HABHI (MMBtu/hr) = ABFFR (lb/hr) x ABHHV (Btu/lb) x (1 MMBtu / 10 ⁶ Btu)
Annual max heat input to aux. boiler	AABHI	269,801	MMBtu/year	AABHI (MMBtu/yr) = HABHI (MMBtu/hr) x HPY (hr/yr)
Total hours/year in operation	HPY	876	hours/year	

Emission Factors for Auxiliary Boiler B (AP42 Section 1.3 [05/10], SCC 10200501)

Description	Variable	Value	Units	Methodology/Source
SO2 Emission Factor for Aux. Boiler	EFSO2	71	lb/kgal	AP-42 Section 1.3, Table 1.3-1
NOx Emission Factor for Aux. Boiler	EFNOx	24	lb/kgal	AP-42 Section 1.3, Table 1.3-1
Particulate Factor for Aux. Boiler	EFPT	2	lb/kgal	AP-42 Section 1.3, Table 1.3-1
PM-10 Emission Factor for Aux. Blr.	EFPTF	1	lb/kgal	AP-42 Section 1.3, Table 1.3-1
CO Emission Factor for Aux. Boiler	EFCO	5	lb/kgal	AP-42 Section 1.3, Table 1.3-1
VOC (NMTOC) Em. Factor for Aux. Boiler	EFVOC	0.2	lb/kgal	AP-42 Section 1.3, Table 1.3-3

Potential to Emit (PTE) Calculations for Auxiliary Boiler B

Description	Variable	Value	Units	Methodology/Source
Hourly Aux. Boiler SO2 Potential to Emit	HABSO2	159.4	lb/hour	HABSO2 (lb/hr) = EFSO2 (lb/kgal) x VMFFR (kgal/hr)
Annual Aux. Boiler SO2 Potential to Emit	AABSO2	69.8	tons/year	AABSO2 (tons/yr) = HABSO2 (lb/hr) x HPY (hr/yr) x (1 ton / 2000 lbs)
Hourly Aux. Boiler Nox Potential to Emit	HABNOx	53.9	lb/hour	HABNOx (lb/hr) = EFNOx (lb/kgal) x VMFFR (kgal/hr)
Annual Aux. Boiler Nox Potential to Emit	AABNOx	23.6	tons/year	AABNOx (tons/yr) = HABNOx (lb/hr) x HPY (hr/yr) x (1 ton / 2000 lbs)
Hourly Aux. Blr. Particulate Potential to Emit	HABPE	4.5	lb/hour	HABPE (lb/hr) = EFPT (lb/kgal) x VMFFR (kgal/hr)
Annual Aux. Blr. Particulate Potential to Emit	AABPE	2.0	tons/year	AABPE (tons/yr) = HABPE (lb/hr) x HPY (hr/yr) x (1 ton / 2000 lbs)
Hourly Aux. Blr. PM-10 Potential to Emit	HAPTE	2.2	lb/hour	HABPTE (lb/hr) = EFPTF (lb/kgal) x VMFFR (kgal/hr)
Annual Aux. Blr. PM-10 Potential to Emit	AAPTE	1.0	tons/year	AABPTE (tons/yr) = HABPTE (lb/hr) x HPY (hr/yr) x (1 ton / 2000 lbs)
Hourly Aux. Boiler CO Potential to Emit	HABCO	11.2	lb/hour	HABCO (lb/hr) = EFCO (lb/kgal) x VMFFR (kgal/hr)
Annual Aux. Boiler CO Potential to Emit	AABCO	4.9	tons/year	AABCO (tons/yr) = HABCO (lb/hr) x HPY (hr/yr) x (1 ton / 2000 lbs)
Hourly Aux. Boiler VOC Potential to Emit	HABVOC	0.4	lb/hour	HABVOC (lb/hr) = EFVOC (lb/kgal) x VMFFR (kgal/hr)
Annual Aux. Boiler VOC Potential to Emit	AABVOC	0.2	tons/year	AABVOC (tons/yr) = HABVOC (lb/hr) x HPY (hr/yr) x (1 ton / 2000 lbs)

SECTION 6 - AIR POLLUTION UNITS and CONTROL EQUIPMENT DATA ⁶²: (Paragraphs 5.f and 7.a of Subsection D of 4NRR11-2H-Subpart III §301)
 (List all Air pollution units of plant, including the units listed in Sections 3 thru 5)

(Use additional sheets if necessary)

Emission Unit No. ⁶³	Process or Operation ⁶⁴	Is Air Pollution Control Equipment Installed (Yes/No) ⁶⁵	Air Pollution Control Equipment No. ⁶⁶	AIR POLLUTION CONTROL EQUIPMENT DATA		AIR POLLUTION CONTROL EQUIPMENT		Applicable Requirements for this Process and/or Control ⁶⁷
				Equipment Type ⁶⁸	Manufacturer and Model No. ⁶⁹	% by Weight ⁷⁰	Method of Determination ⁷¹	
Main Boilers and Auxiliary Boilers								
U1	Unit 1 boiler and stack	Yes	LNB/SOFA1; ESP1; SCR1	Low NO _x Burners; Electrostatic Precipitator; Wet Limestone Scrubber	LNB1: Alstom LNCFS Level III; ESP1: Joy Western N-540 SCR1: ABBES LSFO	LNB1: 25-50%; ESP1: 99.5%; SCR1: 96%	LNB1: Engineering assumption; ESP1: Manufacturer specs; SCR1: Performance test	See OAPAF Attachment 2 for applicability analysis
U2	Unit 2 boiler and stack	Yes	LNB/SOFA2; ESP2; SCR2	Low NO _x Burners; Electrostatic Precipitator; Wet Limestone Scrubber	LNB2: Alstom LNCFS Level III; ESP2: Joy Western N-540 SCR2: ABBES LSFO	LNB2: 25-50%; ESP2: 99.5%; SCR2: 96%	LNB2: Engineering assumption; ESP2: Manufacturer specs; SCR2: Performance test	See OAPAF Attachment 2 for applicability analysis
U3	Unit 3 boiler and stack	Yes	LNB/SOFA3; ESP3; SCR3	Low NO _x Burners; Electrostatic Precipitator; Wet Limestone Scrubber	LNB3: Alstom LNCFS Level III; ESP3: Joy Western N-540 SCR3: ABBES LSFO	LNB3: 25-50%; ESP3: 99.5%; SCR3: 96%	LNB3: Engineering assumption; ESP3: Manufacturer specs; SCR3: Performance test	See OAPAF Attachment 2 for applicability analysis
AUXA	Auxiliary boiler stack A	No	N/A	N/A	N/A	N/A	N/A	See OAPAF Attachment 2 for applicability analysis
AUXB	Auxiliary boiler stack B	No	N/A	N/A	N/A	N/A	N/A	See OAPAF Attachment 2 for applicability analysis
Cooling Towers								
Cool1	Unit 1 Cooling Tower	No	N/A	N/A	N/A	N/A	N/A	
Cool2	Unit 2 Cooling Tower	No	N/A	N/A	N/A	N/A	N/A	
Cool3	Unit 3 Cooling Tower	No	N/A	N/A	N/A	N/A	N/A	
Coal Handling and Storage								
CT1	Railcar Unloading	Yes	WDS	Wet Dust Suppression	Water Pull	50%	Engineering assumption	40 CFR § 49.5513(d)(3)
L1-L12	Hopper Feeders	Yes	WDS	Wet Dust Suppression	Water Pull	50%	Engineering assumption	40 CFR § 49.5513(d)(3)
BC-1 through BC-4	Conveyers to the yard surge bin	Yes	DC-8	Dust Collector	Peabody-Lugar LT 11/30/7	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
BC-4A	Conveyers to the batch weight system	Yes	DC-8	Dust Collector	Peabody-Lugar LT 11/30/7	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)

BFD5A, BC-5	Reclaim conveyers	Yes	DC-8	Dust Collector	Peabody-Lugar LT 11/30/7	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
BC-6	Conveyer to the yard surge bin	Yes	DC-8	Dust Collector	Peabody-Lugar LT 11/30/7	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
BC-6A through BC-6C	Conveyers to the stacker/reclaimer	No	N/A	N/A	N/A	N/A	N/A	40 CFR § 49.5513(d)(3)
BC-7	Conveyer to the emergency reclaim hopper	No	N/A	N/A	N/A	N/A	N/A	40 CFR § 49.5513(d)(3)
YSB-1	Yard surge bin	Yes	DC-8	Dust Collector	Peabody-Lugar LT 11/30/7	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
BC-8A, BC-8B	Conveyers to plant surge bin	Yes	DC-8	Dust Collector	Peabody-Lugar LT 11/30/7	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
PSB-1	Plant Surge Bin	Yes	DC-5	Dust Collector	Engart Global	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
BC-9A, BC-9B	Conveyers to the coal silos for boilers U1 and U2	Yes	DC-5	Dust Collector	Engart Global	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
BC-10A, BC-10B	Conveyers to the coal silos for boilers U3	Yes	DC-5	Dust Collector	Engart Global	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
CC-1A through CC-9A; CC-1B through CC-9B	Three (3) enclosed cascading conveying systems to the coal storage silos for boilers U1, U2, and U3	Yes	DC-1 through DC- 4, DC-6 and DC-7	Dust Collectors	Engart Global	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
Silos 1A through 1G	Storage silos for boiler U1	Yes	DC-1, DC-2, PR-1	Dust Collectors	Engart Global	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
Silos 2A through 2G	Storage silos for boiler U2	Yes	DC-3, DC-4, PR-2	Dust Collectors	Engart Global	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
Silos 3A through 3G	Storage silos for boiler U3	Yes	DC-6, DC-7, PR-3	Dust Collectors	Engart Global	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
CS	Coal Storage Piles	Yes	WDS	Wet Dust Suppression	Water pull	50%	Engineering assumption	40 CFR § 49.5513(d)(3)
Limestone Handling and Storage								
Unloading Bay A and B	Truck unloading operations	No	N/A	N/A	N/A	N/A	N/A	40 CFR § 60.672(d)
O-LSH-HOP-A	Limestone unloading hopper	Yes	DC-9	Dust Collector	Mac 96MCF361	99%	Manufacturer specs	40 CFR § 60.11(d); 40 CFR § 71.6(a)(3)
O-LSH-HOP-B	Limestone unloading hopper	Yes	DC-10	Dust Collector	Mac 96MCF361	99%	Manufacturer specs	40 CFR § 60.11(d); 40 CFR § 71.6(a)(3)
O-LSH-FDR-A	Conveyer	Yes	DC-9	Dust Collector	Mac 96MCF361	99%	Manufacturer specs	40 CFR § 60.11(d); 40 CFR § 60.672(a); 40 CFR § 60.672(b) 40 CFR § 71.6(a)(3)

O-LSH-FDR-B	Conveyer	Yes	DC-10	Dust Collector	Mac 96MCF361	99%	Manufacturer specs	40 CFR § 60.11(d); 40 CFR § 60.672(a); 40 CFR § 60.672(b) 40 CFR § 71.6(a)(3)
O-LSH-CNV-A	Conveyer	Yes	DC-9	Dust Collector	Mac 96MCF361	99%	Manufacturer specs	40 CFR § 60.11(d); 40 CFR § 60.672(a); 40 CFR § 60.672(b) 40 CFR § 71.6(a)(3)
O-LSH-CNV-B	Conveyer	Yes	DC-10	Dust Collector	Mac 96MCF361	99%	Manufacturer specs	40 CFR § 60.11(d); 40 CFR § 60.672(a); 40 CFR § 60.672(b) 40 CFR § 71.6(a)(3)
O-LSH-SILO-A AND B	Limestone storage silos	Yes	DC-11	Dust Collector	Mac 96MCF225	99%	Manufacturer specs	40 CFR § 60.11(d); 40 CFR § 60.672(a); 40 CFR § 71.6(a)(3)
O-LSP-FDR-A and B	Enclosed feeders to the slurry preparation system	No	N/A	N/A	N/A	N/A	N/A	40 CFR § 60.11(d); 40 CFR § 60.672(e)
O-LSP-CNV-A and B	Enclosed cleanout conveyers	No	N/A	N/A	N/A	N/A	N/A	40 CFR § 60.11(d); 40 CFR § 60.672(e)
O-LSP-MILL-A and B	Ball mills	No	N/A	N/A	N/A	N/A	N/A	40 CFR § 60.11(d); 40 CFR § 60.672(e)
LS	Limestone Storage Piles	Yes	WDS	Wet Dust Suppression	Water Pull	50%	Engineering assumption	40 CFR § 60.11(d); 40 CFR § 60.672(b)
Fly Ash Handling and Disposal								
Silo 1	Fly ash bins for Units 1 and 2	Yes	DC-TD and DC- S1/2	Dust Collectors	Torit Downflo, Scientific SPJ-480-X4RT8BV	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
Silo 2	Fly ash bins for Unit 3	Yes	DC-S3	Dust Collector	Scientific SPJ-480- X4RT8BV	99%	Manufacturer specs	40 CFR § 49.5513(d)(3)
Silo 1 and 2 Loading	Partially enclosed ¹ fly ash truck loading operations	No	N/A	N/A	N/A	N/A	N/A	40 CFR § 49.5513(d)(3)
AD	Ash disposal	Yes	WDS	Wet Dust Suppression	Water Pull	50%	Engineering assumption	40 CFR § 49.5513(d)(3)
DWB-A through DWB-F	Bottom ash loading truck operations (processed in wet form)	No	N/A	N/A	N/A	N/A	N/A	40 CFR § 49.5513(d)(3)
Soda Ash/Lime Handling and Storage								
SAB-1A, SAB- 2A, SAB-1B, SAB-2B	Soda ash storage bins	Yes	BH-6	Dust Collector	Graver Water Conditioning Co Aerodyne 14109.6	99%	Manufacturer specs	N/A
LB-1 and LB-2	Lime storage bins	Yes	BH-7	Dust Collector	Graver Water Conditioning Co Aerodyne 14109.6	99%	Manufacturer specs	N/A
Fugitive Emissions								

TR	Fugitive emissions from vehicles traveling on unpaved roads	Yes	WDS	Wet Dust Suppression	Water Pull	75%	EPA AP-42 Section 13.2.2, Figure 12.2.2-2 (moisture ratio = 2)	40 CFR § 49.5513(d)(3)
AB	Abrasive blasting activities	No	N/A	N/A	N/A	N/A	N/A	N/A
WL	Welding activities	No	N/A	N/A	N/A	N/A	N/A	N/A
Emergency Generators								
EG1	Diesel emergency generator	No	N/A	N/A	N/A	N/A	N/A	40 CFR §63.6640(f)(2)
EG2	Diesel emergency generator	No	N/A	N/A	N/A	N/A	N/A	See OAPAF Attachment 2 for applicability analysis
NPG-746	Diesel emergency generator	No	N/A	N/A	N/A	N/A	N/A	See OAPAF Attachment 2 for applicability analysis
E/R Fire Pump	Diesel emergency generator	No	N/A	N/A	N/A	N/A	N/A	See OAPAF Attachment 2 for applicability analysis

SECTION 7 - AIR POLLUTION EMISSION RATES ⁷²: (Paragraph 5.d of Subsection D of 4NNR11-2H-Subpart III §301)

(List all Air pollution units of plant, including the units listed in Sections 3 thru 6, and tank-flashing emissions estimates.)

(Use additional sheets if necessary)

Emission Unit No. ⁷³	ALLOWABLE AIR POLLUTANT EMISSION RATES (after control equipment) ⁷⁴											Emission Rate Units
	Pollutant-1 NO _x	Pollutant-2 VOC	Pollutant-3 SO ₂	Pollutant-4 PM	Pollutant-5 PM ₁₀	Pollutant-6 CO	Pollutant-7 Lead	Pollutant-8 Total HAP ¹	Pollutant-9	Pollutant-10	Pollutant-11	
U1	1,803.5	20.3	373.8	444.6	102.3	1,116.7	0.1	6.3				pounds/hr
	7,800.9	90.4	1,625.8	1,947.2	447.9	4,870.5	0.6	23.3				tons/yr
U2	1,803.5	20.3	373.8	444.6	102.3	1,116.7	0.1	6.3				pounds/hr
	7,800.9	90.4	1,625.8	1,947.2	447.9	4,870.5	0.6	23.3				tons/yr
U3	1,803.5	20.3	373.8	444.6	102.3	1,116.7	0.1	6.3				pounds/hr
	7,800.9	90.4	1,625.8	1,947.2	447.9	4,870.5	0.6	23.3				tons/yr
AUXA	53.9	0.4	159.4	4.5	2.2	11.2	-	2.6				pounds/hr
	23.6	0.20	69.8	1.97	0.98	4.92	-	1.12				tons/yr
AUXB	53.9	0.4	159.4	4.5	2.2	11.2	-	2.6				pounds/hr
	23.6	0.20	69.8	1.97	0.98	4.92	-	1.12				tons/yr
COOL1	--	--	--	1.5	1.5	--	--	--				pounds/hr
	--	--	--	6.4	6.4	--	--	--				tons/yr
COOL2	--	--	--	1.5	1.5	--	--	--				pounds/hr
	--	--	--	6.4	6.4	--	--	--				tons/yr
COOL3	--	--	--	1.5	1.5	--	--	--				pounds/hr
	--	--	--	6.4	6.4	--	--	--				tons/yr
Coal Handling System (Total) ¹	--	--	--	3.0	1.5	--	--	--				pounds/hr
	--	--	--	7.8	3.5	--	--	--				tons/yr
Limestone Handling System (Total) ¹	--	--	--	2.1	1.2	--	--	--				pounds/hr
	--	--	--	3.4	2.5	--	--	--				tons/yr
Ash Handling System (Total) ¹	--	--	--	19.5	9.4	--	--	--				pounds/hr
	--	--	--	85.1	41.0	--	--	--				tons/yr
Soda Ash/Lime Handling	--	--	--	0.1	0.1	--	--	--				pounds/hr
	--	--	--	0.3	0.3	--	--	--				tons/yr

System (Total) ¹												
TR	--	--	--	70.8	18.3	--	--	--				pounds/hr
	--	--	--	310.1	80.0	--	--	--				tons/yr
WL	--	--	--	--	--	--	--	--				pounds/hr
	--	--	--	11.9	11.9	--	--	11.9				tons/yr
AB	--	--	--	55.0	13.0	--	--	--				pounds/hr
	--	--	--	2.8	0.7	--	--	--				tons/yr
Emergency Generators (Total) ¹	63.2	5.1	4.2	4.5	4.5	13.6	--	0.1				pounds/hr
	15.8	1.3	1.0	1.1	1.1	3.4	--	Negligible				tons/yr

1) For PTE units and HAPs represented as totals, individual breakdowns can be seen in the attached PTE Calculation Spreadsheet.

Attachment 2 - Applicability Analysis

Applicable Requirements – AUXA, AUXB

Applicable Requirement	Citation	Text Description of Standards,
Federal Implementation Plan Requirements	40 CFR § 49.5513(e)(1)	During any calendar year in which an auxiliary boiler is operated for 720 hours or more, and at any other time requested by the Administrator, conduct mass emission tests for SO ₂ , NO _x , and PM.
Boiler MACT (Subpart DDDDD)	40 CFR § 63.7495	Each unit must comply with the requirements of the Boiler MACT rule for major sources. This rule has a compliance date of January 31, 2016.
	40 CFR §63.7500(b)	Limited-use boilers require only every 5 year tune-ups and are not subject to the emission limits, annual tune-up, energy assessment or operating limits.
	40 CFR §63.7501	Affirmative Defense requirements
	40 CFR §63.7515(d)	Subsequent tune-ups are required every 5 years.
	40 CFR §63.7525(k)	For limited-use boilers, keep fuel records for the days the boilers were operating.
	40 CFR §63.7540(a)(10)(i) through (vi)	Requirements for a tune-up
	40 CFR §63.7540(a)(12) and (13)	Tune-ups required every 5 years. The burner inspection can be delayed until the next unit shut down, but at least once every 72 months. If a unit is not operating when required to conduct a tune-up, it must be done within 30 days of startup.
	40 CFR §63.7545(a) and (b)	Notifications required: Anything required in the General Provisions and an Initial Notification by 1/31/13.
	40 CFR §63.7545(e)(1)-(e)(8)	Requirements for the content of the Notification of Compliance Status for sources not required to conduct an initial compliance demonstration. This notification is due 60 days after compliance demonstration. Since there are no performance testing requirements for limited use boilers, the report will be submitted 60 days after the initial tune-up.
	40 CFR §63.7550(b)	Units subject to a 5-year tune-up only require a compliance report every 5 years as specified in this section. The first report will cover 1/31/16-1/31/21 and will be submitted on 1/31/22.
	40 CFR §63.7550(c)	The compliance report must contain the information in sections (c)(1), and (c)(5)(i) through (c)(5)(iv) and (xiv).
	40 CFR §63.7555(a)(1)	Keep records of each notification and report.

Attachment 2 - Applicability Analysis

	40 CFR §63.7555(d)(3)	Keep a copy of the permit which limits the annual capacity factor to less than or equal to 10% and fuel use records for the days the boiler was operating. NOTE: SRP is seeking the 10% limit with this renewal permit.
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Applicable HAPs (from AP42 [05/10])

HAPs Substance	EF Source	EF	Units	Potential to Emit¹ (lb/hr)	Potential to Emit² (tons/yr)
Chloride	AP-42 Section 1.3, Table 1.3-11 [05/10]	3.47E-01	lbs/kgal	7.79E-01	3.41E-01
Fluoride	AP-42 Section 1.3, Table 1.3-11 [05/10]	3.73E-02	lbs/kgal	8.37E-02	3.67E-02
Nickel	AP-42 Section 1.3, Table 1.3-11 [05/10]	8.45E-02	lbs/kgal	1.90E-01	8.31E-02
Vanadium	AP-42 Section 1.3, Table 1.3-11 [05/10]	3.18E-02	lbs/kgal	7.14E-02	3.13E-02
Formaldehyde	AP-42 Section 1.3, Table 1.3-11 [05/10]	3.30E-02	lbs/kgal	7.41E-02	3.24E-02
Total HAPs³	AP-42 Section 1.3, Table 1.3-11 [05/10]	6.05E-01	lbs/kgal	1.36E+00	5.95E-01
Total HAPs				2.56E+00	1.12E+00

1) PTE (lb/hr) = Emission Factor (lbs/kgal) x Max. Fuel Usage (kgal/hr)

2) PTE (tons/yr) = Emission Factor (lbs/kgal) x Max. Fuel Usage (gal/yr) x (1 kgal/ 1000 gal) x (1 ton/2000 lbs)

3) The emission factor for total HAPs is the sum of the emission factors for organic HAP and metals.

Applicable HAPs (from AP42 [05/10])

HAPs Substance	EF Source	EF	Units	Potential to Emit ¹ (lb/hr)	Potential to Emit ² (tons/yr)
Chloride	AP-42 Section 1.3, Table 1.3-11 [05/10]	3.47E-01	lbs/kgal	7.79E-01	3.41E-01
Fluoride	AP-42 Section 1.3, Table 1.3-11 [05/10]	3.73E-02	lbs/kgal	8.37E-02	3.67E-02
Nickel	AP-42 Section 1.3, Table 1.3-11 [05/10]	8.45E-02	lbs/kgal	1.90E-01	8.31E-02
Vanadium	AP-42 Section 1.3, Table 1.3-11 [05/10]	3.18E-02	lbs/kgal	7.14E-02	3.13E-02
Formaldehyde	AP-42 Section 1.3, Table 1.3-11 [05/10]	3.30E-02	lbs/kgal	7.41E-02	3.24E-02
Total HAPs ³	AP-42 Section 1.3, Table 1.3-11 [05/10]	6.05E-01	lbs/kgal	1.36E+00	5.95E-01
Total HAPs				2.56E+00	1.12E+00

1) PTE (lb/hr) = Emission Factor (lbs/kgal) x Max. Fuel Usage (kgal/hr)

2) PTE (tons/yr) = Emission Factor (lbs/kgal) x Max. Fuel Usage (gal/yr) x (1 kgal/ 1000 gal) x (1 ton/2000 lbs)

3) The emission factor for total HAPs is the sum of the emission factors for organic HAP and metals.

NAVAJO GENERATING STATION POTENTIAL TO EMIT SUMMARY
(lb/hr)

Substance	CAS No.	Unit 1	U1 Cooling Tower	Unit 2	U2 Cooling Tower	Unit 3	U3 Cooling Tower	Aux. Boiler A	Aux. Boiler B	Coal Handling and Storage	Limestone Handling and Storage	Ash Handling and Disposal	Soda Ash/Lime Handling	Vehicular Fugitives	Welding Rod	Arsative Blasting	Emergency Generators	Total
PM	NA	444.6	1.5	444.6	1.5	444.6	1.5	4.5	4.5	3.0	2.1	19.5	0.1	70.8	--	55.0	4.5	1502.1
PM ₁₀	NA	102.3	1.5	102.3	1.5	102.3	1.5	2.2	2.2	1.5	1.2	9.4	0.1	18.3	--	13.0	4.5	363.5
SO ₂	NA	373.8	--	373.8	--	373.8	--	159.4	159.4	--	--	--	--	--	--	--	4.2	1444.4
NO _x	NA	1,803.5	--	1,803.5	--	1,803.5	--	53.9	53.9	--	--	--	--	--	--	--	63.2	5581.4
CO	**1	1,116.7	--	1,116.7	--	1,116.7	--	11.2	11.2	--	--	--	--	--	--	--	13.6	3386.1
VOC	NA	20.3	--	20.3	--	20.3	--	0.4	0.4	--	--	--	--	--	--	--	5.1	66.9
Lead	NA	0.1	--	0.1	--	0.1	--	--	--	--	--	5.18E-10	--	--	--	--	--	0.4
H ₂ SO ₄	**2	14	--	14	--	14	--	--	--	--	--	--	--	--	--	--	--	42.6
HAPs																		
Total PCDD	92524	2.2E-07	--	2.2E-07	--	2.2E-07	--	--	--	--	--	--	--	--	--	--	--	6.7E-07
Total PCDF	91203	3.7E-07	--	3.7E-07	--	3.7E-07	--	--	--	--	--	--	--	--	--	--	--	1.1E-06
Total PAH	75070	7.0E-03	--	7.0E-03	--	7.0E-03	--	--	--	--	--	--	--	--	--	--	--	2.1E-02
Acetaldehyde	75070	0.2	--	0.2	--	0.2	--	--	--	--	--	--	--	--	--	--	1.10E-02	0.6
Acetophenone	107028	5.0E-03	--	5.0E-03	--	5.0E-03	--	--	--	--	--	--	--	--	--	--	--	1.5E-02
Acrolein	107028	9.7E-02	--	9.7E-02	--	9.7E-02	--	--	--	--	--	--	--	--	--	--	1.32E-03	0.3
Benzene	71432	0.4	--	0.4	--	0.4	--	--	--	--	--	--	--	--	--	--	1.33E-02	1.3
Benzyl Chloride	117817	0.2	--	0.2	--	0.2	--	--	--	--	--	--	--	--	--	--	--	0.7
DEHP	75252	2.4E-02	--	2.4E-02	--	2.4E-02	--	--	--	--	--	--	--	--	--	--	--	0.1
Bromoform	75150	1.3E-02	--	1.3E-02	--	1.3E-02	--	--	--	--	--	--	--	--	--	--	--	3.9E-02
Carbon Disulfide	532274	4.4E-02	--	4.4E-02	--	4.4E-02	--	--	--	--	--	--	--	--	--	--	--	0.1
2-Chloroacetophenone	108907	2.3E-03	--	2.3E-03	--	2.3E-03	--	--	--	--	--	--	--	--	--	--	--	7.0E-03
Chlorobenzene	67663	7.4E-03	--	7.4E-03	--	7.4E-03	--	--	--	--	--	--	--	--	--	--	--	2.2E-02
Chloroform	98828	2.0E-02	--	2.0E-02	--	2.0E-02	--	--	--	--	--	--	--	--	--	--	--	0.1
Cumene	84742	1.8E-03	--	1.8E-03	--	1.8E-03	--	--	--	--	--	--	--	--	--	--	--	5.3E-03
Cyanide	77781	0.8	--	0.8	--	0.8	--	--	--	--	--	--	--	--	--	--	--	2.5
2,4-Dinitrotoluene	121142	9.4E-05	--	9.4E-05	--	9.4E-05	--	--	--	--	--	--	--	--	--	--	--	2.8E-04
Dimethyl Sulfate	100414	1.6E-02	--	1.6E-02	--	1.6E-02	--	--	--	--	--	--	--	--	--	--	--	4.8E-02
Ethyl Benzene	75003	3.2E-02	--	3.2E-02	--	3.2E-02	--	--	--	--	--	--	--	--	--	--	--	0.1
Ethyl Chloride	107062	1.4E-02	--	1.4E-02	--	1.4E-02	--	--	--	--	--	--	--	--	--	--	--	4.2E-02
Ethylene Dichloride	106934	1.3E-02	--	1.3E-02	--	1.3E-02	--	--	--	--	--	--	--	--	--	--	--	4.0E-02
Ethylene Dibromide	50000	4.0E-04	--	4.0E-04	--	4.0E-04	--	--	--	--	--	--	--	--	--	--	--	1.2E-03
Formaldehyde	50000	0.1	--	0.1	--	0.1	--	7.4E-02	7.4E-02	--	--	--	--	--	--	--	1.69E-02	0.5
Hexane	110543	2.2E-02	--	2.2E-02	--	2.2E-02	--	--	--	--	--	--	--	--	--	--	--	0.1
Isophorone	78591	0.2	--	0.2	--	0.2	--	--	--	--	--	--	--	--	--	--	--	0.6
Methyl Bromide	74839	5.4E-02	--	5.4E-02	--	5.4E-02	--	--	--	--	--	--	--	--	--	--	--	0.2
Methyl Chloride	74873	0.2	--	0.2	--	0.2	--	--	--	--	--	--	--	--	--	--	--	0.5
Methyl Hydrazine	71556	5.7E-02	--	5.7E-02	--	5.7E-02	--	--	--	--	--	--	--	--	--	--	--	0.2
Methyl Methacrylate	78933	6.7E-03	--	6.7E-03	--	6.7E-03	--	--	--	--	--	--	--	--	--	--	--	2.0E-02
Methyl Tert Butyl Ether	60344	1.2E-02	--	1.2E-02	--	1.2E-02	--	--	--	--	--	--	--	--	--	--	--	3.5E-02
Methylene Chloride	74884	9.7E-02	--	9.7E-02	--	9.7E-02	--	--	--	--	--	--	--	--	--	--	--	0.3
Phenol	108101	5.4E-03	--	5.4E-03	--	5.4E-03	--	--	--	--	--	--	--	--	--	--	--	1.6E-02
Propionaldehyde	80626	0.1	--	0.1	--	0.1	--	--	--	--	--	--	--	--	--	--	--	0.4
Tetrachloroethylene	1634044	1.4E-02	--	1.4E-02	--	1.4E-02	--	--	--	--	--	--	--	--	--	--	--	4.3E-02
Toluene	108883	8.0E-02	--	8.0E-02	--	8.0E-02	--	--	--	--	--	--	--	--	--	--	5.85E-03	0.2
Styrene	108394	8.4E-03	--	8.4E-03	--	8.4E-03	--	--	--	--	--	--	--	--	--	--	--	2.5E-02
Xylenes	1330207	1.2E-02	--	1.2E-02	--	1.2E-02	--	--	--	--	--	--	--	--	--	--	4.08E-03	4.1E-02
Vinyl Acetate	106445	2.5E-03	--	2.5E-03	--	2.5E-03	--	--	--	--	--	--	--	--	--	--	--	7.6E-03
Antimony	62759	6.0E-03	--	6.0E-03	--	6.0E-03	--	--	--	--	--	--	--	--	--	--	--	1.8E-02
Arsenic	87865	0.1	--	0.1	--	0.1	--	--	--	--	--	--	--	--	--	--	--	0.4
Beryllium	NA	7.0E-03	--	7.0E-03	--	7.0E-03	--	--	--	--	--	1.2E-10	--	--	--	--	--	2.1E-02
Cadmium	108952	1.7E-02	--	1.7E-02	--	1.7E-02	--	--	--	--	--	--	--	--	--	--	--	0.1
Chromium	85449	8.7E-02	--	8.7E-02	--	8.7E-02	--	--	--	--	--	4.9E-10	--	--	--	--	--	0.3
Chromium (VI)	NA	2.6E-02	--	2.6E-02	--	2.6E-02	--	--	--	--	--	--	--	--	--	--	--	0.1
Cobalt	123386	3.4E-02	--	3.4E-02	--	3.4E-02	--	--	--	--	--	--	--	--	--	--	--	0.1
Manganese	100425	0.2	--	0.2	--	0.2	--	--	--	--	--	2.7E-09	--	--	--	--	--	0.5
Mercury	127184	2.8E-02	--	2.8E-02	--	2.8E-02	--	--	--	--	--	--	--	--	--	--	--	0.1
Nickel	108883	1.8E-01	--	1.8E-01	--	1.8E-01	--	0.2	0.2	--	--	5.7E-10	--	--	--	--	--	0.9
Selenium	NA	0.4	--	0.4	--	0.4	--	--	--	--	--	--	--	--	--	--	--	1.3
Hydrogen Fluoride*	1746016	0.4	--	0.4	--	0.4	--	--	--	--	--	--	--	--	--	--	--	1.2
Hydrogen Chloride*	79345	0.6	--	0.6	--	0.6	--	--	--	--	--	--	--	--	--	--	--	1.7
Chloride	NA	0.4	--	0.4	--	0.4	--	0.8	0.8	--	--	--	--	--	--	--	--	2.7
Fluoride	NA	3.9E-02	--	3.9E-02	--	3.9E-02	--	8.4E-02	8.4E-02	--	--	--	--	--	--	--	--	0.3
Vanadium	NA	3.3E-02	--	3.3E-02	--	3.3E-02	--	7.1E-02	7.1E-02	--	--	--	--	--	--	--	--	0.2

Substance	CAS No.	Unit 1	U1 Cooling Tower	Unit 2	U2 Cooling Tower	Unit 3	U3 Cooling Tower	Aux. Boiler A	Aux. Boiler B	Coal Handling and Storage	Limestone Handling and Storage	Ash Handling and Disposal	Soda Ash/Lime Handling	Vehicular Fugitives	Welding Rod	Arasive Blasting	Emergency Generators	Total
Propylene	115071	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	3.7E-02	3.7E-02
1,3-Butadiene	106990	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.2E-03	1.2E-03
Naphthalene	91203	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5.6E-04	5.6E-04
Total HAPs		6.3	--	6.3	--	6.3	--	2.6	2.6	--	--	4.37E-09	--	--	--	--	0.1	24.1

NAVAJO GENERATING STATION POTENTIAL TO EMIT SUMMARY
(tons/year)

Substance	CAS No.	Unit 1	U1		U2		U3		Aux. Boiler A	Aux. Boiler B	Coal Handling and Storage	Limestone Handling and Storage	Ash Handling and Disposal	Soda Ash/Lime Handling	Vehicular Fugitives	Welding Rod	Arasive Blasting	Emergency Generators	Total
			Cooling Tower	Unit 2	Cooling Tower	Unit 3	Cooling Tower	Unit 3											
PM	NA	1,947.2	6.4	1,947.2	6.4	1,947.2	6.4	2.0	2.0	7.8	8.0	85.6	0.3	310.1	11.9	2.8	1.1	6292.2	
PM ₁₀	NA	447.9	6.4	447.9	6.4	447.9	6.4	1.0	1.0	3.5	4.4	41.3	0.3	80.0	11.9	0.7	1.1	1507.8	
SO ₂	NA	1,625.8	--	1,625.8	--	1,625.8	--	69.8	69.8	--	--	--	--	--	--	--	1.0	5017.9	
NO _x	NA	7,800.9	--	7,800.9	--	7,800.9	--	23.6	23.6	--	--	--	--	--	--	--	15.8	23465.6	
CO	**1	4,870.5	--	4,870.5	--	4,870.5	--	4.9	4.9	--	--	--	--	--	--	--	3.4	14624.9	
VOC	NA	90.4	--	90.4	--	90.4	--	0.2	0.2	--	--	--	--	--	--	--	1.3	272.9	
Lead	NA	0.6	--	0.6	--	0.6	--	--	--	--	--	2.27E-09	--	--	--	--	--	1.9	
H ₂ SO ₄	**2	31.1	--	31.1	--	31.1	--	--	--	--	--	--	--	--	--	--	--	93.2	
HAPs																			
Total PCDD	92524	1.0E-06	--	1.0E-06	--	1.0E-06	--	--	--	--	--	--	--	--	--	--	--	3.0E-06	minor
Total PCDF	91203	1.6E-06	--	1.6E-06	--	1.6E-06	--	--	--	--	--	--	--	--	--	--	--	4.9E-06	minor
Total PAH	75070	3.1E-02	--	3.1E-02	--	3.1E-02	--	--	--	--	--	--	--	--	--	--	--	9.4E-02	minor
Acetaldehyde	75070	0.9	--	0.9	--	0.9	--	--	--	--	--	--	--	--	--	--	--	2.74E-03	major
Acetophenone	107028	2.3E-02	--	2.3E-02	--	2.3E-02	--	--	--	--	--	--	--	--	--	--	--	0.1	minor
Acrolein	107028	0.4	--	0.4	--	0.4	--	--	--	--	--	--	--	--	--	--	--	3.31E-04	1.3
Benzene	71432	2.0	--	2.0	--	2.0	--	--	--	--	--	--	--	--	--	--	--	3.34E-03	5.9
Benzyl Chloride	117817	1.1	--	1.1	--	1.1	--	--	--	--	--	--	--	--	--	--	--	--	3.2
DEHP	75252	0.1	--	0.1	--	0.1	--	--	--	--	--	--	--	--	--	--	--	--	0.3
Bromoform	75150	5.9E-02	--	5.9E-02	--	5.9E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.2
Carbon Disulfide	532274	0.2	--	0.2	--	0.2	--	--	--	--	--	--	--	--	--	--	--	--	0.6
2-Chloroacetophenone	108907	1.1E-02	--	1.1E-02	--	1.1E-02	--	--	--	--	--	--	--	--	--	--	--	--	3.2E-02
Chlorobenzene	67663	3.3E-02	--	3.3E-02	--	3.3E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.1
Chloroform	98828	8.9E-02	--	8.9E-02	--	8.9E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.3
Cumene	84742	8.0E-03	--	8.0E-03	--	8.0E-03	--	--	--	--	--	--	--	--	--	--	--	--	2.4E-02
Cyanide	77781	3.8	--	3.8	--	3.8	--	--	--	--	--	--	--	--	--	--	--	--	11.3
2,4-Dinitrotoluene	121142	4.2E-04	--	4.2E-04	--	4.2E-04	--	--	--	--	--	--	--	--	--	--	--	--	1.3E-03
Dimethyl Sulfate	100414	7.2E-02	--	7.2E-02	--	7.2E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.2
Ethyl Benzene	75003	0.1	--	0.1	--	0.1	--	--	--	--	--	--	--	--	--	--	--	--	0.4
Ethyl Chloride	107062	6.3E-02	--	6.3E-02	--	6.3E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.2
Ethylene Dichloride	106934	6.0E-02	--	6.0E-02	--	6.0E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.2
Ethylene Dibromide	50000	1.8E-03	--	1.8E-03	--	1.8E-03	--	--	--	--	--	--	--	--	--	--	--	--	5.4E-03
Formaldehyde	50000	0.4	--	0.4	--	0.4	--	0.0	0.0	--	--	--	--	--	--	--	--	4.22E-03	1.2
Hexane	110543	0.1	--	0.1	--	0.1	--	--	--	--	--	--	--	--	--	--	--	--	0.3
Isophorone	78591	0.9	--	0.9	--	0.9	--	--	--	--	--	--	--	--	--	--	--	--	2.6
Methyl Bromide	74839	0.2	--	0.2	--	0.2	--	--	--	--	--	--	--	--	--	--	--	--	0.7
Methyl Chloride	74873	0.8	--	0.8	--	0.8	--	--	--	--	--	--	--	--	--	--	--	--	2.4
Methyl Hydrazine	71556	0.3	--	0.3	--	0.3	--	--	--	--	--	--	--	--	--	--	--	--	0.8
Methyl Methacrylate	78933	3.0E-02	--	3.0E-02	--	3.0E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.1
Methyl Tert Butyl Ether	60344	5.3E-02	--	5.3E-02	--	5.3E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.2
Methylene Chloride	74884	0.4	--	0.4	--	0.4	--	--	--	--	--	--	--	--	--	--	--	--	1.3
Phenol	108101	2.4E-02	--	2.4E-02	--	2.4E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.1
Propionaldehyde	80626	0.6	--	0.6	--	0.6	--	--	--	--	--	--	--	--	--	--	--	--	1.7
Tetrachloroethylene	1634044	6.5E-02	--	6.5E-02	--	6.5E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.2
Toluene	108883	0.4	--	0.4	--	0.4	--	--	--	--	--	--	--	--	--	--	--	1.46E-03	1.1
Styrene	108394	3.8E-02	--	3.8E-02	--	3.8E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.1
Xylenes	1330207	5.6E-02	--	5.6E-02	--	5.6E-02	--	--	--	--	--	--	--	--	--	--	--	1.02E-03	0.2
Vinyl Acetate	106445	1.1E-02	--	1.1E-02	--	1.1E-02	--	--	--	--	--	--	--	--	--	--	--	--	3.4E-02
Antimony	62759	2.7E-02	--	2.7E-02	--	2.7E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.1
Arsenic	87865	0.6	--	0.6	--	0.6	--	--	--	--	--	--	--	--	--	--	--	--	1.9
Beryllium	NA	3.2E-02	--	3.2E-02	--	3.2E-02	--	--	--	--	--	5.2E-10	--	--	--	--	--	--	0.1
Cadmium	108952	7.7E-02	--	7.7E-02	--	7.7E-02	--	--	--	--	--	--	--	--	--	--	--	--	0.2
Chromium	85449	3.9E-01	--	3.9E-01	--	3.9E-01	--	--	--	--	--	2.1E-09	--	--	0.7	--	--	--	1.9
Chromium (VI)	NA	0.1	--	0.1	--	0.1	--	--	--	--	--	--	--	--	--	--	--	--	0.4
Cobalt	123386	0.2	--	0.2	--	0.2	--	--	--	--	--	--	--	--	--	--	--	--	0.5
Manganese	100425	0.7	--	0.7	--	0.7	--	--	--	--	--	1.2E-08	--	--	10.9	--	--	--	13.1
Mercury	127184	0.1	--	0.1	--	0.1	--	--	--	--	--	--	--	--	--	--	--	--	0.4
Nickel	108883	0.5	--	0.5	--	0.5	--	0.1	0.1	--	--	2.5E-09	--	--	0.24	--	--	--	1.8
Selenium	NA	2.0	--	2.0	--	2.0	--	--	--	--	--	--	--	--	--	--	--	--	5.9
Hydrogen Fluoride*	1746016	1.7	--	1.7	--	1.7	--	--	--	--	--	--	--	--	--	--	--	--	5.2
Hydrogen Chloride*	79345	2.5	--	2.5	--	2.5	--	--	--	--	--	--	--	--	--	--	--	--	7.5
Chloride	NA	0.2	--	0.2	--	0.2	--	0.3	0.3	--	--	--	--	--	--	--	--	--	1.2

Substance	CAS No.	Unit 1	U1 Cooling Tower	Unit 2	U2 Cooling Tower	Unit 3	U3 Cooling Tower	Aux. Boiler A	Aux. Boiler B	Coal Handling and Storage	Limestone Handling and Storage	Ash Handling and Disposal	Soda Ash/Lime Handling	Vehicular Fugitives	Welding Rod	Arasive Blasting	Emergency Generators	Total		
Fluoride	NA	1.9E-02	--	1.9E-02	--	1.9E-02	--	0.0	0.0	--	--	--	--	--	--	--	--	0.1	minor	
Vanadium	NA	1.6E-02	--	1.6E-02	--	1.6E-02	--	0.0	0.0	--	--	--	--	--	--	--	--	0.1	minor	
Propylene	115071	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	9.2E-03	9.2E-03	minor
1,3-Butadiene	106990	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	3.0E-04	3.0E-04	minor
Naphthalene	91203	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.4E-04	1.4E-04	minor
Total HAPs		23.3	--	23.3	--	23.3	--	1.1	1.1	--	--	1.91E-08	--	--	11.9	--	2.28E-02	84.1		



**APPLICATION FOR PART 71 FEDERAL OPERATING PROGRAM
 NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY
 NAVAJO NATION AIR QUALITY CONTROL PROGRAM**



FORM EUD-1 – EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES

INSTRUCTIONS:

Complete this form once for the facility. You may find it helpful to complete form EMISS for each emissions unit before completing this form. For each emissions unit with emissions that count towards applicability, list the emissions unit ID and the PTE for the air pollutants listed below. If there are other air pollutants not listed below for which the source is a major source, provide attachments naming the air pollutant and showing calculation of the total for that pollutant. Round values to the nearest tenth of a ton. Add all values together in each column and enter the total in the space provided at the bottom of the table. Also report these totals in **section J** of **Form GIS**.

Emission Unit	Regulated Air Pollutants and Pollutants for which the source is Major						
	NOx tons/yr	VOC tons/yr	SO ₂ tons/yr	PM ₁₀ tons/yr	CO tons/yr	Lead tons/yr	HAP tons/yr
U1	7,800.9	90.4	1,625.8	447.9	4,870.5	0.6	23.3
U2	7,800.9	90.4	1,625.8	447.9	4,870.5	0.6	23.3
U3	7,800.9	90.4	1,625.8	447.9	4,870.5	0.6	23.3
AUXA	23.6	0.2	69.81	1.00	4.9	-	1.12
AUXB	23.6	0.2	69.81	0.98	4.92	-	1.12
COOL1	--	--	--	6.4	--	--	--
COOL2	--	--	--	6.4	--	--	--
COOL3	--	--	--	6.4	--	--	--
Coal Handling System (Total) ¹	--	--	--	3.5	--	--	--
Limestone Handling System (Total) ¹	--	--	--	4.4	--	--	--
Ash Handling System (Total) ¹	--	--	--	41.3	--	--	--
Soda Ash/Lime Handling System (Total) ¹	--	--	--	0.3	--	--	--
TR	--	--	--	80.0	--	--	--
WL	--	--	--	11.9	--	--	11.9
AB	--	--	--	0.7	--	--	--
Emergency Generators (Total) ¹	15.8	1.3	1.0	1.1	3.4	--	Negligible
TOTALS	23,890.5	276.5	6,274.4	1,525.7	14,713.3	1.8	104.2

1) For PTE units represented as totals, individual calculations can be seen in the attached PTE Calculation Spreadsheet.

NNEPA FORM I-COMP

A. Compliance Status of Each Applicable Requirement (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement:	Unit ID(s):	Compliance Status at time of application
Each unit must comply with the requirements of the Boiler MACT in 40 CFR §63 Subpart DDDDD for major sources (40 CFR §§63.7495, 63.7500(b), 63.7501, 63.7515(d), 63.7525(k), 63.7540(a)(10)(i) through (vi), 63.7540(a)(12) and (13), 63.7545(a) and (b), 63.7545(e)(1) through (e)(8), 63.7550(b), 63.7550(c), 63.7555(a)(1), 63.7555(d)(3). This rule has a compliance date of January 31, 2016.	AUX1, AUX2	<input type="checkbox"/> In Compliance <input checked="" type="checkbox"/> Not In Compliance

B. Methods Used To Determine Compliance (Describe all methods used to determine compliance with this requirement)

<p>Methods Used:</p> <p>This rule has a compliance date of January 31, 2016; SRP will comply with this standard by conducting the required tune-ups, maintaining the required records and submitting the required notifications.</p>
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C. Compliance Plan Statements (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>3. For future effective requirements, I will meet this requirement on a timely basis</p> <p style="text-align: center;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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A. Compliance Status of Each Applicable Requirement (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement:	Unit ID(s):	Compliance Status at time of application
Conduct an initial tune up and every 5 years thereafter (40 CFR §§63.7500(b), 63.7515(d), 63.7540(a)(10)(i) through (vi), 63.7540(a)(12) and (13). This rule has a compliance date of January 31, 2016.	AUX1, AUX2	<input type="checkbox"/> In Compliance <input checked="" type="checkbox"/> Not In Compliance

B. Methods Used To Determine Compliance (Describe all methods used to determine compliance with this requirement)

<p>Methods Used:</p> <p>This rule has a compliance date of January 31, 2016; SRP will comply with this standard by conducting an initial tune-up by January 31, 2016.</p>

C. Compliance Plan Statements (Respond to one of these statements for this applicable requirement)

<p>1. If in compliance at this time, I will continue to comply</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>2. If not in compliance at this time, I will be in compliance by expected date of permit issuance</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>3. For future effective requirements, I will meet this requirement on a timely basis</p> <p style="text-align: center;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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NNEPA FORM I-COMP

A. Compliance Status of Each Applicable Requirement (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement:	Unit ID(s):	Compliance Status at time of application
Maintain fuel records, tune-up records and records of the permit limiting the annual capacity factor(40 CFR §§63.7525(k), 63.7555(a)(1), 63.7555(d)(3)) This rule has a compliance date of January 31, 2016.	AUX1, AUX2	<input type="checkbox"/> In Compliance <input checked="" type="checkbox"/> Not In Compliance

B. Methods Used To Determine Compliance (Describe all methods used to determine compliance with this requirement)

Methods Used: This rule has a compliance date of January 31, 2016; SRP will comply with this standard by maintaining the records specified in the rule.
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C. Compliance Plan Statements (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply <input type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance <input type="checkbox"/> Yes <input type="checkbox"/> No	3. For future effective requirements, I will meet this requirement on a timely basis <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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A. Compliance Status of Each Applicable Requirement (Describe each applicable requirement and determine its compliance status)

Cite and Describe the Applicable Requirement:	Unit ID(s):	Compliance Status at time of application
Submit notifications and reports (40 CFR §§63.7545(a) and (b), 63.7545(e)(1)-(e)(8), 63.7550(b) and (c)) This rule has a compliance date of January 31, 2016.	AUX1, AUX 2	<input type="checkbox"/> In Compliance <input checked="" type="checkbox"/> Not In Compliance

B. Methods Used To Determine Compliance (Describe all methods used to determine compliance with this requirement)

Methods Used: This rule has a compliance date of January 31, 2016; SRP will comply with this standard by submitting the required notifications and reports.
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NNEPA FORM I-COMP

C. Compliance Plan Statements (Respond to one of these statements for this applicable requirement)

1. If in compliance at this time, I will continue to comply <input type="checkbox"/> Yes <input type="checkbox"/> No	2. If not in compliance at this time, I will be in compliance by expected date of permit issuance <input type="checkbox"/> Yes <input type="checkbox"/> No	3. For future effective requirements. I will meet this requirement on a timely basis <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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